



SAWAEER LAW OFFICE PLLC
6915 5th Ave, 2nd Floor. Brooklyn, New York. 11209. Tel: 718-833-2290
mohammad@sawaeerlaw.com

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Via ECF

Hon. John P. Cronan
United States District Court
Southern District of New York 40 Foley Square,
New York, New York 10007

Re: HGM v. Solo International et al 1:22-CV-07149-JPC-KHP,

Honorable Judge Cronon,

I represent the plaintiff, **HGM**, in the above-referenced matter, and submit this letter to request one final adjournment for the following reasons:

1. Plaintiff was ordered to file proof of service of that Order adjourning the default judgment hearing originally scheduled for April 17, 2024, at 11:00 a.m., to April 18, 2024, at 9:00 a.m. Dkt. 43, by April 12, 2024. In addition, on April 11, 2024, the Court issued an Order requiring Plaintiff to provide the Court with a variety of additional information necessary for conducting the April 18 default judgment hearing. Dkt. 44. Plaintiff was directed to file proof of service of both Orders by today, April 15, 2024.
2. The undersigned kindly request the court to grant him a final adjournment to serve the court order on the defendant as directed in Dkt. 43, and provide the additional information necessary for conducting the default judgment hearing as directed in Dkt 44.
3. The undersigned was unable to comply with the aforementioned order as I was observing the fasting month of Ramadan which was ended on April 12th, 2024, and was out of office for the last two weeks before April 12th, 2024.
4. I understand that it is not an excuse not to track my emails, but this was overlooked, and I sincerely apologize for it, and kindly request the court to grant me a one final adjournment to serve the new

court date on the defendants, , if granted, and provide the additional information as directed by the court.

Thank you for your consideration in this matter.

Dated: Brooklyn, New York, April 17, 2024

Sincerely,

/s/ *Mohammad Alsawaeer*

Mohammad Alsawaeer, Esq
Attorney for the Plaintiff, HGM

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Brooklyn, New York. 11209.
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The request is granted. The default judgment hearing scheduled for April 18, 2024, at 9:00 a.m. is adjourned to May 8, 2024, at 9:30 a.m. At the scheduled time, the parties should call (866) 434-5269, access code 9176261.

Plaintiff's deadline to provide the additional information detailed in the Court's April 11 Order, Dkt. 44, is adjourned to April 29, 2024. In addition, as indicated in that Order, the Court found the Amended Complaint unclear as to whether the two causes of action are pleaded against some, or all, of the named Defendants. *See id.* at 1-2. Should Plaintiff wish to amend the Amended Complaint to clarify this issue, Plaintiff alternatively may file any Second Amended Complaint by April 29, 2024 (and then, of course, comply with its service obligations on Defendants).

Moreover, in the event that Plaintiff intends to proceed with its default judgment motion, Plaintiff should be prepared to address at the May 8, 2024 hearing whether any of the Defendants have filed for bankruptcy and, if so, whether the automatic bankruptcy stay at 11 U.S.C. § 362 applies to such Defendants. *See* Dkt. 28-3 (email attached to Defendants' former counsel's motion to withdraw in which "Harry Bailey" stated that "we are filing for personal bankruptcy").

Plaintiff shall serve a copy of this Order and the prior Orders that the Court required be served on Defendants, Dkts. 43-44, via overnight mail and file proof of such service by April 24, 2024.

SO ORDERED
Date: April 18, 2024
New York, New York



JOHN P. CRONAN
United States District Judge